

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JILL STEIN, et al.,

Plaintiffs,

v.

KATHY BOOCKVAR, in her official
capacity as Acting Secretary of the
Commonwealth, and JONATHAN MARKS,
in his official capacity as Commissioner of
the Bureau of Commissions, Elections and
Legislation,

Defendants.

CIVIL ACTION

No. 16-cv-6287(PD)

DECLARATION OF BETHANY SALZARULO

I, Bethany Salzarulo, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that:

I am the Director of Elections & Voter Registration for Cumberland County. I make this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Enforce the Settlement Agreement.

1. I have been employed by Cumberland County (the "BoE") for the past 15 years.
2. As the Director of Elections & Voter Registration, I direct and manage the activities of the county registration office, manage the ballot preparation process, oversee and certify election results.
3. In August 2018, I was directed by the BoE to begin searching for certified voting system vendors in order to conduct vetting of various voting systems.
4. My staff viewed demonstrations and tested multiple voting systems on more than one occasion for each voting system.

5. The vetting process concluded on or around June 2019, which resulted in a recommendation to the BoE that the ExpressVote XL electronic voting system (the “ExpressVote XL”) be selected for purchase by Cumberland County.

6. On or about June 26, 2019, the BoE voted to confirm the selection of the ExpressVote XL.

7. On or about September 23, 2019, the Cumberland County Board of Commissioners (the “BoC”) voted to approve the procurement of the ExpressVote XL.

8. On November 14, 2019, Cumberland County purchased four hundred (400) ExpressVote XL systems through the Commonwealth of Pennsylvania’s Cooperative Purchasing Program (“COSTARS”) for the amount of \$3,965,612.00.

9. Cumberland County anticipates the delivery of the ExpressVote XL to occur sometime between January 13, 2020 and January 17, 2020.

10. After the machines arrive, a week-long testing of the machines will occur prior to acceptance of the delivery.

11. Training for the ExpressVote XL is scheduled to begin the first week of February 2020. Cumberland County estimates that training for 1,200 poll workers will take approximately two (2) months. As a result, training is expected to be completed on or about April 1, 2020, just weeks before the April 28, 2020 Pennsylvania primary election.

12. In addition to training poll workers, Cumberland County will engage in voter outreach and advertising to educate voters regarding the use the ExpressVote XL system.

13. The ballot for an election is finalized roughly 50 days before the election. Once this occurs, the BoE begins pretesting of the voting machines.

14. Following pretesting, each machine is loaded with the ballots for its respective

election division and given a numerical seal.

15. If Cumberland County were required to switch to a different type of voting system, the BoE would have to begin reevaluating new voting systems in order to select and have a new system ready for the April 28, 2020 primary election. Based on Cumberland County's past experience, this process of evaluation, procurement, training, and rollout of the new machines could last for over a year and a half but would need to be expedited to comply with the state mandate. Even expediting this process would set back the County training and voter outreach which could have an impact on the Primary.

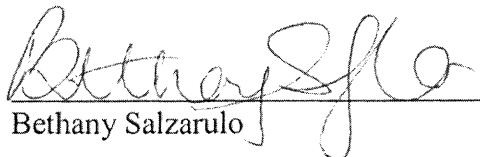
16. Switching to a voting system other than the ExpressVote XL would cause the public confusion, especially as the BoE advertised the use of the ExpressVote XL system for months.

17. Based on the requirements and timeline outlined above, there is substantial basis to doubt that Cumberland County could switch to a voting system other than ExpressVote XL in time for the April 28, 2020 primary election. At a minimum, switching to a voting system other than the ExpressVote XL would pose a grave danger compromising the integrity of the election by leaving insufficient time for system testing, poll-worker training, and voter education.

SIGNATURE CONTINUED TO NEXT PAGE

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2019.


Bethany Salzarulo